

TERRY GODDARD  
Attorney General  
Firm Bar No. 14000

TODD C. LAWSON  
State Bar No. 020216  
Assistant Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007-2926  
Telephone 602-542-3881  
crmFRAUD@azag.gov

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA**

THE STATE OF ARIZONA,  
  
Plaintiff,

vs.

**DEBORAH CHERYL BENNETT a/k/a  
DEBORAH CHERYL PAURA (001)**

Defendant.

Case No:

**66 SGJ 22**

**INDICTMENT**

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES  
AND ARTIFICES**, a Class 2 Felony in  
violation of A.R.S. § 13-2310

**COUNT 2-6: THEFT**, Class 2 Felonies in  
violation of A.R.S. §§ 13-1802

**COUNT 7: FRAUD IN PURCHASE OR  
SALE OF SECURITIES**, a Class 4 Felony,  
in violation of A.R.S. §§ 44-1991 and 44-  
1995

**COUNT 8: TRANSACTIONS BY  
UNREGISTERED DEALER**, a Class 4  
Felony in violation of A.R.S. §§ 44-1842

The 66<sup>th</sup> Arizona State Grand Jury accuses **DEBORAH CHERYL BENNETT  
A/K/A DEBORAH CHERYL PAURA** charging on this 20<sup>TH</sup> day of January, 2010, that in  
or from Maricopa County, Arizona:

## COUNT 1

### FRAUDULENT SCHEMES AND ARTIFICES

On or between April 6, 2006, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit by means of false or fraudulent pretenses, representation, promises or material omissions, in violation of A.R.S. §§13-2310, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** accepted checks from the investors listed in the attached Exhibit A (referred to herein as "the investors"). While receiving this money, the Defendant represented that she would invest the money in stocks and guaranteed a rate of return. The Defendant represented that she would return the principle and the guaranteed interest to the investors. The Defendant used a portion of the money for personal use, and did not return the principle and guaranteed interest to the investors.

## COUNT 2

### THEFT

On or between August 31, 2006, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, without lawful authority, knowingly obtained services or property by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** obtained funds from investor Matthew Bennett indicating that she would invest the funds, while in actuality she used a portion of the funds for her own personal benefit.

**COUNT 3**

**THEFT**

On or between April 9, 2007, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, without lawful authority, knowingly obtained services or property by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** obtained funds from investor Jeanette Kirk indicating that she would invest the funds, while in actuality she used a portion of the funds for her own personal benefit.

**COUNT 4**

**THEFT**

On or between April 2, 2007, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, without lawful authority, knowingly obtained services or property by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** obtained funds from investor Sharron Lewis indicating that she would invest the funds, while in actuality she used a portion of the funds for her own personal benefit.

**COUNT 5**

**THEFT**

On or between April 2, 2007, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, without lawful authority, knowingly obtained services or property by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** obtained funds from investors Thomas and Barbara Payne indicating that she would invest the funds, while in actuality she used a portion of the funds for her own personal benefit.

**COUNT 6**

**THEFT**

On or between April 3, 2007, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, without lawful authority, knowingly obtained services or property by means of any material misrepresentation with intent to deprive the other person of such property, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when the defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** obtained funds from investors Barry and Judy Stern indicating that she would invest the funds, while in actuality she used a portion of the funds for her own personal benefit.

...

**COUNT 7**

**FRAUD IN PURCHASE OR SALE OF SECURITIES**

On or between April 6, 2006, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** in connection with a transaction or transactions within or from this State involving an offer to sell or buy securities, or a sale or purchase of securities, directly or indirectly, (1) employed a device, scheme or artifice to defraud, (2) made untrue statements of material fact, or omitted to state a material fact necessary in order to make the statements not misleading, or (3) engaged in a transaction, practice or course of business which operated as a fraud or deceit, in violation of A.R.S. § 44-1991, 44-1995, 13-701, 13-702 and 13-801.

Said conduct occurred when defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA**, in connection with her offer to invest in securities on behalf of the investors listed in the attached Exhibit A (referred to herein as "the investors"), made fraudulent assertions to the investors in order to receive funds from them and engaged in trading practices which were fraudulent and deceitful in that she converted their money for personal use.

**COUNT 8**

**TRANSACTIONS BY UNREGISTERED DEALER**

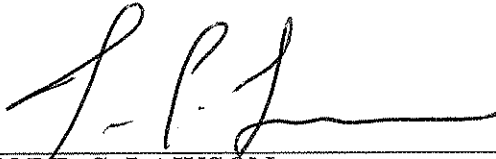
On or between April 6, 2006, and September 28, 2007, defendant **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** offered for sale a security within Arizona as an unregistered dealer or salesman in violation of A.R.S. §§ 44-1842, 44-1801, 13-701, 13-702 and 13-801.

Said conduct occurred when **DEBORAH CHERYL BENNETT A/K/A DEBORAH CHERYL PAURA** offered to buy and sell securities for the investors listed in the attached Exhibit A without being a registered dealer or salesman.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.


A True Bill  
(A "True Bill")

TERRY GODDARD  
ATTORNEY GENERAL  
STATE OF ARIZONA



TODD C. LAWSON  
Assistant Attorney General

Dated: 1/20/2010



Foreperson of the State Grand Jury

PHX-#483946-v3-BENNETT\_INDICTMENT\_DOC

## EXHIBIT A

As used in this indictment, "the investors" refers to:

1. Bennett, James E.
2. Bennett, Matthew E.
3. Broughman, Mary Beth
4. Broughman, Mary Lynn
5. Brown, Jason
6. Chenery, John & Carla
7. Clark, Cheryl
8. Dantagnan, Barry & Kathy
9. Dreifuerst, Luann
10. Dreifuerst, Melissa & Thomas
11. Eubanks, Tina & Ralph
12. Hercus, Michael
13. Kendell, Leslie
14. Kirk, Bernard & Jeanette
15. Kish, Nancy
16. Krause, Ken Sr. & Annie
17. Kuryanowicz, JoAnn
18. Lewis, Delbert & Sharron
19. Morano, Grace
20. Morresey, Leo
21. Payne, Thomas & Barbara
22. Potter, Roger & Traci
23. Pye, Douglas
24. Shaw, Marcia
25. Skipwith, Marc
26. Steinke, Pamela
27. Stern, Barry & Judith
28. Taylor, Skip
29. Vyslouzil, Robert
30. Walas, Tom
31. Webber, Matthew
32. Wronski, Ron & Fran